

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

TOM COLTHURST (CABN 99493)
Chief, Criminal Division

LAURA VARTAIN HORN (CABN 258485)
NICHOLAS WALSH (CABN 314290)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Laura.Vartain@usdoj.gov
Nicholas.Walsh@usdoj.gov

NICHOLAS O. HUNTER (DCBN 1022355)
STEPHEN MARZEN (NYBN 2007094)
Trial Attorneys, National Security Division

950 Pennsylvania Ave., NW
Washington, DC 20530
Tel: (202) 353-3434
Fax: (202) 233-2146
Nicholas.Hunter@usdoj.gov
Stephen.Marzen@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00465 MMC
Plaintiff,)	STIPULATIONS RE: CERTAIN DEVICES
v.)	
FUJIAN JINHUA INTEGRATED CIRCUIT)	The Honorable Maxine M. Chesney
CO., LTD,)	Trial: February 28, 2022, at 9:00 am
Defendant.)	Courtroom 7, 19 th Floor

FACTUAL STIPULATIONS

The parties hereby stipulate, for purposes of the trial of this action, that the following facts are conclusively established and are not in dispute:

1. On February 7, 2017, Ministry of Justice Investigation Bureau (“MJIB”) special agents seized a portable hard drive, HDD Model: WDC_WD6400BEVT-22A0RT0, serial number WD-WXR1EB0YVJ30, at Kenny Wang’s residence in Taiwan.
2. On February 7, 2017, MJIB special agents seized an ACER brand laptop, HDD Model: WDC_WD2500BEVT-00A23T0, hard drive serial number WD-WXL1A61D6393, at Kenny Wang’s residence in Taiwan.
3. On February 8, 2017, J.T. Ho voluntarily turned over to MJIB special agents a portable hard drive, Model: ST1000LM024_HN-M101MBB, serial number 755912FD9J813S, that J.T. Ho obtained at his residence in Taiwan.
4. On February 9, 2017, Taiwanese law enforcement obtained a HP brand laptop, HDD Model: TOSHIBA_MK5061GSYN, hard drive serial number 32J5FRTWS, label UMC030761.
5. On February 9, 2017, Taiwanese law enforcement obtained a flash drive, Model: USB 3.0 FD, serial number 340373E9817A4117B03132FD0F7679.
6. On February 9, 2017, Taiwanese law enforcement obtained a flash drive, Model: DataTraveler 2.0, serial number 1C6F654E59A2FDB159042.
7. On February 14, 2017, MJIB special agents seized a hard drive, HDD Model: Hitachi_HTS545050A7E380, serial number TA9511GZHEDS1S, at L.T. Rong’s UMC office in Taiwan.
8. On February 14, 2017, MJIB special agents seized an ACER brand UMC laptop, Model: KINGSTON_RBU-SC100S37240GE, hard drive serial number 50026B72480D77FB, at L.T. Rong’s UMC office in Taiwan.

9. On February 14, 2017, MJIB special agents seized a flash drive, Model: Transcend 32GB, serial number AA00000000000489, at L.T. Rong's UMC office in Taiwan.

The undersigned parties agree and stipulate to the foregoing facts.

TRIAL STIPULATIONS

The parties hereby stipulate, for purposes of the trial of this action, that:

1. Jinhua will not object to the relevance of the devices identified in Paragraphs 4, 5 and 6, above. Jinhua, however, reserves the right to argue that the forensic images obtained from those devices are not authentic or admissible, including based upon the arguments made in Jinhua's Motion in Limine, Dkt. 247.

The undersigned parties agree and stipulate to the foregoing.

Dated: February 27, 2022

Respectfully Submitted,

STEPHANIE M. HINDS
United States Attorney

/s/

LAURA VARTAIN HORN
NICHOLAS WALSH
Assistant United States Attorneys

NICHOLAS O. HUNTER
STEPHEN MARZEN
Trial Attorneys, National Security Division

Dated: February 27, 2022

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/

JACK P. DICANIO
MATTHEW E. SLOAN
EMILY REITMEIER
Attorneys for Defendant
Fujian Jinhua Integrated Circuit Co., Ltd.